

**BEFORE THE BOARD OF EDUCATIONAL EXAMINERS  
OF THE STATE OF IOWA**

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EXECUTIVE DIRECTOR  
BOARD OF EDUCATIONAL EXAMINERS

JAN 05 2017

In the matter of:	)	BOEE Case No. 16-134
	)	Folder # 808634
<b>Todd W. Verwers,</b>	)	
	)	<b>COMBINED STATEMENT OF</b>
Respondent.	)	<b>CHARGES, SETTLEMENT</b>
	)	<b>AGREEMENT, AND FINAL ORDER</b>

In accordance with the provisions of Iowa Code sections 17A.12(5) and 272.2(4) and 282 IAC 11.4(6), and with full knowledge of the right to demand a formal hearing before the Board upon the pending complaint prior to the imposition of sanction upon his license, the Respondent expressly waives the right to a disciplinary hearing and notifies the Board of his desire to resolve the pending complaint through means of informal disposition.

The Respondent concedes the jurisdiction of the Board for all issues relevant hereto and voluntarily consents to the State's counsel presenting this agreement to the Board with the terms provided. If the Board does not accept the terms of this agreement, the disciplinary hearing will be rescheduled and the stipulations contained herein are not binding upon the Respondent and will not be presented against him at the time of hearing without further agreement of the Respondent.

Board approval of this settlement shall constitute resolution of this matter and will be entered as a FINAL ORDER of the Board.

**NOTICE OF HEARING**

A hearing in this matter will not be held, as the State and Respondent have entered into the following consent agreement in lieu of scheduling a contested case hearing. If the Board does not accept this Combined Statement of Charges, Settlement Agreement, and Final Order, the matter may be set for hearing in accordance with 282 Iowa Administrative Code rule 11.7.

**STIPULATIONS**

1. Respondent holds a coaching authorization (FOLDER # 808634). Respondent's license is current and will next expire on January 20, 2020.
2. During the relevant facts of this matter, Respondent was not employed as a coach.
3. On September 14, 2016, the Executive Director of the Board of Educational Examiners, Ann Lebo, filed a complaint against Respondent alleging a violation of the Code of Ethics.

4. On November 7, 2016, the Board found probable cause to proceed to hearing based upon the facts set forth in paragraph 6 below.

5. The Board charged Respondent with violation of Board rule 282 Iowa Administrative Code 25.3(7)(d), which requires compliance with Board orders.

6. As a result of a previous ethics complaint, 14-54, Respondent was required to submit to the Board proof of completion of fifteen hours of Ethics for Educators by August 7, 2016. Respondent did not submit the paperwork by August 7, 2016. Investigation revealed that Respondent had not completed the course.

7. Respondent took the required course on December 14, 2016, in Waterloo, Iowa, and submitted his transcript to the Board. Respondent has otherwise complied with the terms of the settlement agreement in 14-54.

### **SETTLEMENT AGREEMENT**

8. This Combined Statement of Charges, Settlement Agreement, and Final Order constitutes the final resolution of a contested case proceeding and shall have the force and effect of a disciplinary order entered following a contested case hearing.

9. In order to resolve this matter without proceeding to hearing, Respondent agrees to the following conditions:

- a. Respondent accepts a WRITTEN REPRIMAND.
- b. Respondent agrees his license will be suspended for FOURTEEN DAYS, effective upon the Board's acceptance of this Agreement.

### **LICENSEE DECLARATION**

I understand that this Combined Statement of Charges, Settlement Agreement, and Final Order is subject to the approval of the Board and will have no force or effect if it is not accepted by the Board.

I understand State's counsel will present this Combined Statement of Charges, Settlement Agreement, and Final Order to the Board *ex parte*.

I agree to comply with the requirements set forth in the stipulations and requirements of this Combined Statement of Charges, Settlement Agreement, and Final Order and understand that my failure to do so can result in additional discipline of my coaching authorization.

I understand that this Combined Statement of Charges, Settlement Agreement, and Final Order is a public record, which will become part of my permanent licensure file and will be available for public inspection and reproduction.

I understand that my name will be added to the national clearinghouse database kept by the National Association of State Directors of Teacher Education and Certification (NASDTEC).

December 29, 2016  
Date

Todd W. Verwers  
Todd W. Verwers, Respondent

## ORDER

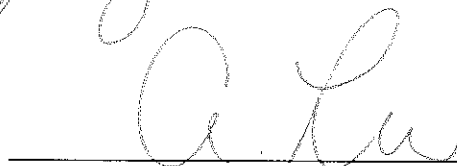
IT IS THE FINAL ORDER OF THE IOWA BOARD OF EDUCATIONAL EXAMINERS THAT:

1. The conduct with which Respondent has been charged constitutes a violation of the Code of Professional Conduct and Ethics governing the teaching profession. Respondent is REPRIMANDED for the charged conduct.

2. Respondent's license shall be suspended for fourteen days.

3. In determining the appropriate sanction to impose in this case, the Board has considered the nature and seriousness of the allegations as well as mitigating circumstances.

Dated this 12<sup>th</sup> day of January, 2017.



Ann Lebo, Executive Director  
Iowa Board of Educational Examiners

Copies to:

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3918 Harrison  
Prole, Iowa 50229  
RESPONDENT

Jordan Esbrook  
ATTORNEY FOR THE STATE